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June 22, 1998

**BY HAND DELIVERY**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

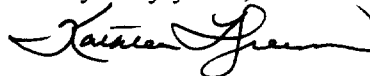
Re: Ex Parte Presentation in CC Docket No. 92-77

Dear Ms. Salas:

Pursuant to Section 1.1206(a) of the Commission's Rules, 47 C.F.R. § 1.1206(a) (1997), this is to provide an original and one copy of a notice of an *ex parte* presentation made today in the above-referenced proceeding on behalf of Teltrust Communications Services, Inc. ("Teltrust"), by Joseph Sharkey, Pamela Arluk and the undersigned, to Adrien Auger, Anita Cheng, Kurt Schroeder and Robert Spangler of the Enforcement Division, Common Carrier Bureau. The purpose of the meeting was to discuss Teltrust's request for waiver of the FCC's on-demand rate disclosure requirement for all non-access calls (0+ calls). Copies of the attached written materials were provided to the FCC participants at the meeting. At the participants' request, some additional information regarding cost estimates has been added to the materials. Furthermore, Teltrust respectfully requests that these materials be incorporated into its request for waiver filed on April 9, 1998 in connection with the Joint Petition for Reconsideration.

Should any further information be required with respect to this *ex parte* notice, please do not hesitate to contact me. I would also appreciate it if you would date-stamp the enclosed extra copy of this filing and return it with the messenger to acknowledge receipt by the Commission.

Very truly yours,



Kathleen L. Greenan

Enclosures

cc: Robert W. Spangler, Deputy Chief  
Kurt Schroeder, Chief  
Adrien R. Auger, Esq.  
Anita Cheng, Esq.  
Joseph E. Sharkey, Chief Operating Officer  
Dana Frix, Esq.  
Pamela Arluk, Esq.

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## **Billed Party Preference for InterState 0+ Calls - Rate Quote**

Notes from comments by Joseph E. Sharkey – Chief Operating Officer Teltrust Communications Services, Inc.

Teltrust will not be able to meet the July 1<sup>st</sup> 1998 date with an Interim solution let alone and appropriate, long term, final solution.

Teltrust is a wholesaler of Agent Services (Toll Assist and Directory Assistance) for hundreds of Carriers, Independent Payphone Providers, Aggregators, CLECs, LECs and Wireless Telephone companies. Teltrust inter-connects with many of our customers utilizing unique interface arrangements that have been developed over the years to gain network efficiency.

Teltrust is dependant upon the engineering and design work of the primary switching system manufacturer and at least two (2) third party developers in order to complete a long term and final solution.

Since a final solution is not available today Teltrust is forced into the position of developing and deploying an interim solution.

We currently provide rate quote, when desired by 800 number access from all public payphones and aggregator locations that we service. To move this rate quote function into the mainstream of call processing requires substantial modifications to the platforms, databases, billing systems and methods and procedures for the operator work force.

Valuable resources will be dedicated to the short term fix while diverting attention away from a long term, more economical and integrated solution.

Every option we have considered for the interim solution will pose financial and technical difficulties and will increase the chance of consumer dissatisfaction.

Presently the manufacturer of our base switching system is targeting late fourth quarter '98 or first quarter '99 for a "Beta" test time frame for the final solution.

### **NOTES:**

1) Before the combined efforts of our vendors can produce a final solution we will be deploying four (4) new switches that will require the implementation of the interim solution system(s) to then be replaced within months with the final solution system(s).

2) On our platform we offer # re-origination for user convenience – if rate quote is required on all calls we will not be able to offer the service any longer without first routing the caller back to the front-end system (not determined how yet) for re-prompting

for rate quote. Therefore this user convenience service will probably need to be discontinued until the final solution can be developed.

The technology does not exist, in our network today, to provide automated rate quote or even the menu that would allow consumers to hear a rate quote announcement and then select the option to access a live operator for the rate quote. Even if we could provide the menu to select rate quote we will no longer be able to route these calls to our existing rate quote lines since this location can not provide call completion with billable call records.

The present Operator Work Stations (OWSs) are DOS based systems and do not have the capability to "toggle" or "window" into the type of a rate quote application that will be necessary to comply with the intent of the rule. Even if the OWS could toggle or window into other applications the present master operator system does not have the database available for actual ANI based rate quotes. In order to do this it will require extensive upgrades and changes at all of our operator centers.

## **BILLING and CALL RATING**

BILLING or call rating, today, is a totally separate function from network switching and is done on a "batch basis" up to as much as 26 or 27 hours after some calls are processed. Call processing through locations other than Salt Lake City (NY, Atlanta, Miami, Los Angeles 1 & 2, and soon 3 of the 4 new switches) is entirely removed from the rating systems which are located in Salt Lake City.

The Billing System design, today, accommodates unidentified ANIs and creates exception files which allows IPPs or Aggregators to route traffic to us for call processing while waiting for the site information up to 6 days after calls appear on the network. This process will need to be changed and all ANIs will be required to have full detail prior to allowing call processing - reducing client convenience.

The type of on-demand rate quote systems required to comply with the rule are not yet available on our platform. The system will have to prompt and obtain from the consumer sufficient information for accurate rate quotes. The system will have to be able calculate all factors related to the total call cost such as:

- Time of Day
- Distance based on V&H coordinates
- Duration \*
- Billing Arrangement
- Third Party
- Calling Card
- T&E Card
- Collect

- Auto Collect\*\*
- Surcharges
- PIFs
- Fees – such as USF \*\*\*

#### **NOTES:**

\*Billing Duration – due to rounding and actual call connect time billed duration may vary from a consumers timed or estimated talk time which can impact customer service inquiry levels

\*\*Auto Collect – if a consumer requests the live operator to complete the call the live operator rate varies from the auto operator rate consumers will expect the live operator to complete calls since they are on-line with them – charging extra will increase consumer dissatisfaction.

\*\*\*USF "fees" adds yet another level of complexity to providing accurate rate quotes.

#### **Switch Platforms Processes**

- All calls will have to
- "wait" while a new peripheral processor (redundant on each system) determines jurisdiction(s) and then
- routes the consumer to either the traditional treatment (BONG) or
- intercepts the call in progress with a menu system offering additional user instructions then
- caller will be routed to a live operator for rate quote

NOTE: The manufacturer of Teltrust's core switching platform does not offer the menuing system required to comply with the FCC's rule therefore, a third party vendor is being utilized to develop the application.

#### **A Solution will require:**

- Development of software and an application processor (for each site) to determine Intra or Inter-State
- Menu/Messaging system to offer connection to rate quote information for InterState calls
- Added call set up time on every call
- Added work time on every Interstate call while option for rate quote is played
- Added hardware for additional volume
- Added hardware for increased network time
- Additional trunk facilities
- Increase in general consumer dissatisfaction

NOTE: The ability to release calls back to an originating switch to return to the automated platform (without hang up) is not yet developed therefore, calls requesting rate quote will long hauled/back hauled to Salt Lake City and be held there throughout call completion increasing the most costly part of the network.

NOTE: Many of these factors are currently undefined and require testing and implementation in order to accurately quantify the necessary increase of each factor.

### **Special Interconnection Arrangements**

The above addresses our concerns relative to calls that are presented to Teltrust under "normal" call set up conditions. Teltrust as a wholesaler of agent services also interfaces with many carriers utilizing unique interconnection arrangements that present even more problems then stated above:

- Dedicated Access Lines (DALs) (we may not know if call was non access 0+) with carrier doing the billing
- 800# accesss with Account Code ID (we may not know if call was non access 0+)

### **RATE QUOTE to BILLED PARTY (Collect or 3<sup>rd</sup> Party)**

The above addresses our concerns relative to calls that are presented to Teltrust under "non-alternate billing" call set up conditions. 0+ calls that request collect or third party will wind up offering the rate quote option to both the calling party as well as the called/billed party adding yet more complexity and additional technical issues to the solution as well as substantially increasing work time on these calls. During the Interim Solution period an operator will have to stay on line for each call being set up to a collect party to provide rate quote upon request. This can add as much as 30 seconds (average) of operator work time to every collect or 3<sup>rd</sup> party call.

### **Estimated Costs to Teltrust for Development of an Interim Solution**

Since Teltrust joint in the petition (April 9, 1998) we have developed better estimates of our costs to develop an Interim solution. These costs are follows:

#### **Nonrecurring Costs**

Manufacturer's and Third Party Software/Licenses for 9 sites	\$405,000
Public Switched Network Interface (T1) Cards in switches	\$121,500
Industrial - Redundant - application processor for all sites	\$153,900
Installation (including travel related expenses)	<u>\$135,000</u>
Hardware and Software Total	\$815,400

#### **Monthly Recurring Costs**

Network Costs	
· Private Line	\$ 22,487
· Local and Carrier Access Time	\$ 4,800
· IT department maintenance updates to rate quote system	Unknown
· Operator Work Time	<u>Unknown</u>
Total estimated monthly recurring	\$ 27,287 ++

#### **Miscellaneous Costs - To be Determined**

- Internal IT development costs to deploy and maintain rate quote on the OWS server system
- Additional Operator Work Stations equipped with 2<sup>nd</sup> computers
- Increased disk storage (redundant) on OWS server systems

#### **Historical Note**

Based on Teltrust internal survey documentation less then one-half of one percent (0.5%) of callers request rate quote information.